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MEMO ENDORSED

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BY ECF

The Honorable Louis L. Stanton
United States District Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Chanel, Inc. v. WGACA, LLC, et al., 18-cv-02253 (LLS)

Dear Judge Stanton:

This law firm represents plaintiff Chanel, Inc. ("Chanel") in the above-referenced matter. Pursuant to Your Honor's Individual Practices in Civil Cases Rule 3.B, we write to respectfully request that Your Honor issue an order permitting Chanel to file under seal several exhibits supporting Chanel's letter brief to compel the WGACA Defendants ("Defendants") to produce documents. The letter brief is concurrently being filed with certain exhibits substituted with slip sheets indicating that they have been redacted in their entirety. These exhibits represent or reference Defendants' documents produced under CONFIDENTIAL or ATTORNEYS EYES ONLY basis, and Chanel seeks to request that these exhibits be filed under seal on this ground.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Theodore C. Max

Theodore C. Max

Enclosures

cc: All Counsel of Record

January 15, 2021 This application
is denied for lack of specific-
ity or any showing that the
material qualifies under the
line of cases following Lugosch
v. Pyramid Co., 435 F.3d 110
(2d Cir. 2006). Louis L. Stanton

2/5/21

